

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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SEP 21 1992

MAIL BRANCH

In the Matter of

Amendment of the Amateur Service)
Rules to Include Novice Class)
Operator License Examinations in)
The Volunteer-Examiner Coordinator)
Examination System)

PR Docket No. 92-154

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission

COMMENTS OF RAY ADAMS N4BAQ

As originally stated, the Volunteer Examiner program was to be administered by examiners who held credit for one element higher than the element being administered, if there was a higher element. This limited the Advanced class examiner to the administration of elements 1A, (5WPM), 2 (Novice written test), and 3 (Technician/General written test) at the inception of the Volunteer Examiner program. Any licensee, General class or higher could continue to function in the Novice testing program which had been operating for some time.

"Novice Enhancement" on March 21, 1987 in a single report and order brought several changes that affect the matter of present concern.

1. Voice privileges extended to Novice class licensees caused that class of license to be much more desirable than before, particularly in view of the newly-acquired privileges on ten meters combined with the timing in the sunspot cycle which permitted international communications to become the common occurrence rather than the exception.

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2. Dividing the element 3 Technician/General class 50-question examination into a 25 question Technician class examination and a 25 question General class examination. At this point, the General class licensee is holding credit for both a code and a written element in excess of the requirements of a Technician class license. The commission had already declined to permit the VECs of the nation to accredit General class examiners, thus they remained limited to the Novice testing program only.

3. Two General or higher class licensees were required to administer the Novice examination, which was raised to a 30 question test.

On February 14, 1991, the morse code requirement was removed from the Technician class license, resulting in a drastic increase in the number of newly-licensed amateurs, the bulk of which came via the codeless Technician route, thus lessening the importance of the Novice class license. Because of this action, as Chairman of the Question Pool Committee elected by the annual National Conference of Volunteer Examiner Coordinators, I released to public domain a retraction of five specific questions in the then-publicly-held question pools that were to be withdrawn from use. Two of these questions were in the Novice question pool. Communicating with the other 17 VECs certainly presented no problem and was readily accomplished. There was, and to my knowledge remains even today, no practical way to communicate such instructions to the Novice examiners of America. Most, I'm sure complied fully with both the spirit and the letter of the release. Others legitimately didn't get the word, even though the entirety of the amateur media, to my knowledge, printed the announcement. Some

still found it more convenient to use tests already on hand, rationalizing that it "didn't make much difference" possibly even when an entire pool had in fact been changed. There is a very visible path of communication from the VE to the FCC in the Novice testing program as it is presently structured, yet there is no path of communication from the FCC (or the Question Pool Committee) to the examiners. Lack of bilateral communication produces immediate and total lack of control. The Commission summarily lost control of the Novice testing program when the practice of mailing the examiner the particular test to be administered to the applicant in question was stopped.

As with all decisions of change, there are both advantages and disadvantages involved with the proposed move:

Among the advantages, I would list

1. Re-establishment of bilateral communications capability between the FCC (or the Question Pool committee) and all Volunteer examiners regardless of the class of license for which they are testing, thus restoring control of the Novice testing program.
2. Reduction of the error rate experienced on the applications presented for processing and issuance of Novice licenses.
3. Establishment of uniform standards (the public announcement, for instance) for all amateur examination.

4. Assuming the General Class licensee is in fact authorized to administer the Technician Class examination as commented upon below, the VECs will be afforded a larger pool of potential examiners with which to handle the additional workload caused not only by the insertion of the Novice testing into the VEC system, but the spiraling demand already presenting itself because of the codeless Technician Class previously authorized. In short, we need their help.

The disadvantages apparent to me are

1. Reduction in the availability of the Novice test.

Many Novice VEs, I'm sure, will not bother, or may not know how to gain accreditation.

Others may elect to "let George do it" rather than follow the stricter guidelines the VEC system will undoubtedly impose.

This disadvantage is mitigated to a great degree by the popularity presently being experienced of the Codeless Technician Class which is reducing the importance of the Novice Class license as the port of entry to amateur radio

The only practical answer I see to the problem addressed is to bring the Novice testing program into the VEC system, administered on the same basis as any other VEC coordinated element in order not to disrupt that proven system.

There still remains a problem in the proposed modification in that the creation of yet a third class of Volunteer Examiner will originate unavoidable confusion in the proper handling of the massive paperwork of the program by the VECs.

As a practicing Certified Public Accountant, I both recognize and appreciate good internal controls, financial or other. A good example of other controls is the system W5YI-VEC has in place to protect the test elements the Advanced Class Examiner is not authorized to administer from falling into his hands. This, and similar systems in other VECs, would self-destruct and dictate total redesign if the VECs of the nation must create yet a third class of VE, with the three classes being regulatorily separated by class of license held. The creation of the third class of VEs would unavoidably create more errors inside the VEC system than we now experience, resulting in an accomplishment that is in fact the exact opposite from one of the goals of the proposal, error reduction. Absorbing the General class VE into the system with privileges equal to that of the Advanced Class VE could be taken in stride by W5YI-VEC's excellent system with the only modification needed being simply the class of license accepted for accreditation as the lower class of VE.

This third class, being the General Class licensee limited to administering the Novice elements only, appears to me to be totally unnecessary, as the General Class licensee of today, once accredited as a VE, should, by virtue of definitions advanced at the inception of the VE program, be authorized to administer the Technician Class test as the program is presently structured.

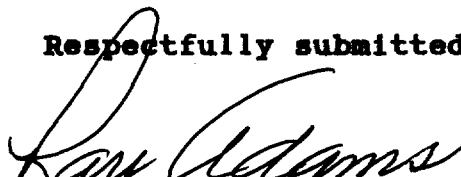
For the reasons stated above, I believe the Commission should modify the rules as proposed, except that Section 97.511(b) should be revised to read:

(b) Each examination must be administered by 3 VEs, each of whom must hold an FCC-issued amateur operator license of the class specified below:

(1) For a Novice or Technician Class operator license examination, the administering VEs must hold Amateur Extra, Advanced, or General Class operator licenses;

(2) For a General, Advanced, or Amateur Extra Class operator license examination, the administering VEs must hold Amateur Extra Class operator licenses.

Respectfully submitted


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